

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE: PROTON-PUMP INHIBITOR PRODUCTS LIABILITY LITIGATION (NO. II)</b>  <b>This Document Relates to:</b>  <i>Trina A. Waldon v. Abbott Laboratories, et al.</i>  <b>Civil Action No.: 2:19-cv-1779</b>	<b>MDL No. 2789 (CCC) (MF)</b>
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**STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITHOUT PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Trina A. Waldon and Defendants AstraZeneca Pharmaceuticals LP, AstraZeneca LP and Merck & Co. Inc. d/b/a Merck, Sharp & Dohme Corporation, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), that Plaintiff Trina A. Waldon's claims be voluntarily dismissed without prejudice, and with each party to bear its own costs.

**For Plaintiff Trina A. Waldon:**

/s/ Douglass A. Kreis

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**For Defendant AstraZeneca**

**Pharmaceuticals, LP, AstraZeneca LP and  
Merck & Co. Inc.**

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Dated: 05/28/2019

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SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
HONORABLE CLAIRE C. CECCHI, U.S.D.J.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 28, 2019, a copy of the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system.

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